



July 17, 2003

Mr. K. Dane Snowden
Chief, Consumer and Government Affairs Bureau
Federal Communications Commission
Washington, D.C. 20544

02-278

Dear Mr. Snowden,

I am writing to you on behalf of the 16,500 members of the Washington Association of REALTORS® to express our disappointment with the FCC's recent decision to extend the Do Not Call rules to intrastate calling activities.

Our Washington Association of REALTORS® has worked closely with the members of the Washington Legislature for many years to carefully craft language that served the best interests of Washington consumers and regulated industry groups. The Washington Commercial Telephone Solicitation Act provides important safeguards for our citizens, yet still permits real estate agents to contact Washington residents that may have an interest in selling, purchasing, leasing or renting real property.

Our members certainly appreciate the sensitive nature of this issue, and clearly understand that not all real estate practitioners desire to engage in telephone solicitation activities. However, many agents routinely contact "for sale by owners", owners of expired listings, and owners in specific neighborhoods known as "farming" areas. Cold-calling is not performed to finalize business transactions. This type of telephone contact is generally a communication vehicle to schedule appointments.

While the proposed rule does not strictly prohibit these activities, the additional cross-referencing and research to insure calls are not being placed to individuals on the list will become increasingly burdensome, costly, and counterproductive.

We don't believe that Congress intended for these regulations to usurp state regulations and statutes. Please reconsider your actions of late June, and rescind those regulations relating to intrastate calls. Thank you for your thoughtful consideration of our request.

Respectfully,

DeWayne Granacki, President
Washington Association of REALTORS®

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